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Attorney for Defendants  
CITY OF SAN LEANDRO, POLICE CHIEF IAN R. WILLIS,  
DETECTIVE GOODMAN, DETECTIVE RAMSEY,  
OFFICER L. BRANDT, OFFICER GUILLEN, and DET. SGT. DeCOSTA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KATHY LEE,

Plaintiff,

v.

CITY OF SAN LEANDRO, IAN R. WILLIS,  
in his official capacity as Chief of Police in San  
Leandro, OFFICER DEBORAH TRUJILLO  
(#297), individually and in her official capacity,  
SAN LEANDRO POLICE DEPARTMENT,  
DETECTIVE GOODMAN (#282), individually  
and in his official capacity, DETECTIVE  
RAMSEY (#307), individually and in his  
official capacity, OFFICER L. BRANDT  
(#273), individually and in his official capacity,  
OFFICER GUILLEN (#291), individually and  
in his official capacity, DET. SGT. DeCOSTA  
(#234), individually and in his official capacity,  
and DOES 1-40,

Defendants.

Case No: C 10-00104 MMC

**STIPULATION TO CONTINUE DATES  
CONTAINED IN CASE MANAGEMENT  
AND PRETRIAL ORDER;  
~~PROPOSED~~ ORDER**

First Amended Complaint Filed:  
April 5, 2010

COMES NOW Plaintiff Kathy Lee and Defendants City of San Leandro, Ian R. Willis, Officer Deborah Trujillo, Detective Goodman, Detective Ramsey, Officer L. Brandt, Officer Guillen, Det. Sgt. DeCosta (collectively "Defendants"), and present the following Stipulation;

WHEREAS due to the schedule of counsel for Plaintiff, there has been the need for additional time to complete discovery, and the parties therefore stipulate to the brief extension set forth below to allow them to complete the necessary discovery;

WHEREAS none of the suggested changes will affect the Court's scheduled deadlines;

WHEREAS the Court's August 13, 2010 Case Management and Pretrial Order sets forth the following dates and deadlines:

Completion of non-expert discovery: February 18, 2011;

Expert disclosure: March 11, 2011;

Completion of expert discovery: April 15, 2011;

Filing of dispositive motions: April 29, 2011;

Settlement Conference: February 2011, according to Court's availability;

Pretrial Conference: July 19, 2011;

IT IS HEREBY STIPULATED by Plaintiffs and Defendants that they request the Court to modify its Case Management and Pretrial Order to set the following dates and deadlines, or soon thereafter as practicable:

Completion of non-expert discovery: April 1, 2011;

Expert disclosure: April 15, 2011;

Completion of expert discovery: April 29, 2011;

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1 Dated: February 2, 2011

Respectfully submitted,

2 MEYERS, NAVE, RIBACK, SILVER & WILSON

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5 By: \_\_\_\_\_ /S/

6 Matthew A. Lavrinets  
7 Attorneys for Defendants  
8 CITY OF SAN LEANDRO, POLICE CHIEF IAN R.  
9 WILLIS, DETECTIVE GOODMAN, DETECTIVE  
10 RAMSEY, OFFICER L. BRANDT, OFFICER  
11 GUILLEN, and DET. SGT. DeCOSTA

12 Dated: February 2, 2011

LAW OFFICE OF STEPHEN M. FUERCH

13 By: \_\_\_\_\_ /S/

14 Stephen M. Fuerch  
15 Attorneys for Defendant DEBORAH TRUJILLO

16 Dated: February 2, 2011

LAW OFFICE OF RUSSELL A. ROBINSON

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18  
19 By: \_\_\_\_\_ /S/

20 Russell A. Robinson  
21 Attorneys for Plaintiff KATHY LEE

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23 IT IS SO ORDERED

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26 Dated: February 7, 2011

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United States District Judge

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